## Remarks

# **I. Administrative Overview**

Claims 1-30 were presented for examination. Applicants hereby amend Claims 1, 5-6, 8-9, 11, 13, 16, 21, 23-24 and 28. Upon entry of the present amendments, Claims 1-30 are presented for examination. No new matter has been introduced.

The specification has been amended to correct informalities. No new matter has been introduced.

Applicants respectfully request reconsideration and withdrawal of the objections and rejections to the claims as amended.

# **II. Claim Objections**

Claims 1 and 16 are objected to for the use of confusing grammar. Applicants respectfully submit that the amendments made to Claims 1 and 16 overcome this rejection. Accordingly, Applicants respectfully request that the Examiner withdraw all claim objections.

## III. Rejections under 35 U.S.C. § 103

#### Claims 1-6 and 16-21

Claims 1-6 and 16-21 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft Windows 2000/2003 Server as evidenced by "Remote Access VPN Connections" ("Microsoft01") in view of ISA Server 2000/2004 as evidenced by "Common DNS Issues in VPN Networking" ("ISA01") and "Multiple Simultaneous VPN Connections" ("LinuxQuestions"). Applicants respectfully submit that Claims 1-6 and 16-21 as previously presented are patentable over any combination of Microsoft01, ISA01 and LinuxQuestions.

A claimed invention is obvious when a cited reference either alone or in combination with another reference, teaches or suggests each and every element of the claimed invention.

Applicants respectfully submit that any combination of Microsoft01, ISA01 and LinuxQuestions fails to teach or suggest each and every element of the claimed invention.

Microsoft01 fails to teach or suggest assigning a virtual host name to a user of a computer as required by each independent claim. Instead, Microsoft01 describes how to create a remote access connection to a VPN server. When a user connects to the VPN server, the server assigns

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the VPN client an IP address, not a host name as is done in the claimed invention. Further Microsoft01 does not teach assigning a host name to a user; it describes assigning an IP address to a VPN client on a remote machine.

Similarly, ISA01 also does not teach or suggest assigning a virtual host name to a user of a computer as required by each independent claim. Described in ISA01 are common DNS issues encountered when a client uses a VPN to access a private network, and ways to avoid such issues. In particular, ISA01 described how to avoid the problem posed by a VPN client that cannot resolve DNS host names on an internal network. ISA01 teaches that the way to avoid this problem is to assign a DNS server address to the VPN client so that the VPN client can translate network host names into IP addresses using the DNS server resident at the DNS server address. Having the ability to translate a host name on a network into an IP address is not the same as being assigned a virtual host name because the DNS server address is not a virtual host name. What is more, there is no suggestion in ISA01 that having access to a particular DNS server is the same as assigning a virtual host name. Therefore, assigning a DNS server address to a VPN client is not the same as assigning a user of a computer a virtual host name.

LinuxQuestions, like Microsoft01 and ISA01, also does not teach or suggest assigning a virtual host name to a user of a computer as required by each independent claim.

LinuxQuestions describes how to establish two VPN clients on the same machine by either assigning multiple IP addresses to a network interface card or by using multiple network interface cards in one machine. LinuxQuestions does not teach or even suggest that a virtual host name can or should be assigned to a user of the machine.

In light of the above mentioned remarks, Microsoft01, ISA01 and LinuxQuestions fail to teach or suggest assigning a virtual host name to a user of a computer, and so fail to teach or suggest each and every element of independent Claims 1 and 16. For this reason, Claims 1 and 16 are patentable over any combination of Microsoft01, ISA01 and LinuxQuestions. Claims 2-6 and 17-21 are also patentable over any combination of Microsoft01, ISA01 and LinuxQuestions,

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<sup>&</sup>lt;sup>1</sup> Providing a DNS server address allows the VPN client to access the DNS server used by a private network, to resolve host names resident on that internal network. Having access to the DNS server merely provides the VPN client with the ability to look-up host names on the private network and translate them into IP addresses the client can use to access the computers represented by the host names.

because Claims 2-6 and 17-21 are dependent on Claims 1 and 16. Applicants respectfully request that the Examiner withdraw all rejections of Claims 1-6 and 16-21 under 35 U.S.C. §103.

## Claims 7-9, 14-15, 22-24 and 29-30

Claims 7-9, 14-15, 22-24 and 29-30 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft01 in view of ISA01 in view of LinuxQuestions and in further view of Examiner's official notice that registering with DNS servers, as is described in the abovementioned claims, is well known in the art ("OfficialNotice"). Applicants respectfully submit that Claims 7-9, 14-15, 22-24 and 29-30 are patentable over any combination of Microsoft01, ISA01, LinuxQuestions and Official Notice.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1 and 16 are patentable and in a condition for allowance Because Claims 7-9, 14-15, 22-24 and 29-30 depend from and incorporate all the patentable subject matter of Claims 1 and 16, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites OfficialNotice merely for the purpose of addressing registering with a DNS server. OfficialNotice fails to teach or suggest assigning a virtual host name to a user of a computer, and so fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 7-9, 14-15, 22-24 and 29-30 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 7-9, 14-15, 22-24 and 29-30 under 35 U.S.C. §103.

## Claims 10-11 and 25-26

Claims 10-11 and 25-26 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft01 in view of ISA01 in view of LinuxQuestions and in further view of "Assign Static IP to a VPN user" ("VelocityReviews"). Applicants respectfully submit that Claims 10-11 and 25-26 are patentable over any combination of Microsoft01, ISA01, LinuxQuestions and Velocity Reviews.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1 and 16 are patentable and in a condition for allowance

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Because Claims 10-11 and 25-26 depend from and incorporate all the patentable subject matter of Claims 1 and 16, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites VelocityReviews merely to address an IP address comprising the virtual host name following the first user from the first computer to a second computer and being associated with the second computer. VelocityReviews fails to teach or suggest assigning a virtual host name to a user of a computer, and so fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 10-11 and 25-26 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 10-11 and 25-26 under 35 U.S.C. §103.

### Claims 12-13 and 27-28

Claims 12-13 and 27-28 are rejected under 35 U.S.C. § 103(a) as unpatentable over Microsoft01 in view of ISA01 in view of LinuxQuestions in view of VelocityReviews and in further view of U.S. Patent No. 6,856,676 to Pirot et al. ("Pirot"). Applicants respectfully submit that Claims 12-13 and 27-28 are patentable over any combination of Microsoft01, ISA01, LinuxQuestions, Velocity Reviews and Pirot.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In view of the arguments stated above, Applicants submit that independent Claims 1 and 16 are patentable and in a condition for allowance Because Claims 12-13 and 27-28 depend from and incorporate all the patentable subject matter of Claims 1 and 16, these dependent claims are also patentable and in condition for allowance. Furthermore, the Examiner cites Pirot merely to address assigning, while the first user accesses the first computer, a third virtual hostname to the first user accessing a second computer. Pirot fails to teach or suggest assigning a virtual host name to a user of a computer, and so fails to detract from the patentability of the claimed invention. As such, Applicants submit that Claims 12-13 and 27-28 are patentable and in condition for allowance. Accordingly, Applicants request the Examiner to withdraw the rejection of Claims 12-13 and 27-28 under 35 U.S.C. §103.

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## IV. Conclusion

Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application, the Examiner is urged to contact Applicants' agent at the telephone number identified below.

Respectfully submitted, CHOATE, HALL & STEWART LLP

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